



The Sherwin-Williams Company
Environmental, Health & Regulatory Services
101 Prospect Avenue, N.W.
Cleveland, Ohio 44115-107N
Facsimile: (216) 566-2730

May 10, 2005

Mr. Ray Klimcsak
U.S. Environmental Protection Agency – Region 2
290 Broadway 19th Floor
New York, New York 10007-1866

RE: Proposal to Collect Conduct TAL Metals Analysis Versus XRF Analysis
Vacant Lot - RI/FS Activities, Gibbsboro, New Jersey

Dear Mr. Klimcsak:

As discussed at our April 28, 2005 meeting, The Sherwin-Williams Company (Sherwin-Williams) is proposing to modify the analytical requirements for the Vacant Lot from that proposed in the approved November 2003 Gibbsboro Remedial Investigation/Feasibility Study (RI/FS) Work Plan and subsequent implementation sequence letter dated August 16, 2004.

The approved Work Plan requires the collection of two soil samples from each soil boring. According to the approved Work Plan, the soil samples were to be analyzed for metals using XRF field instruments. Initially, Sherwin-Williams proposed utilizing x-ray fluorescence (XRF) since we were planning to analyze for lead only. However, the U.S. Environmental Protection Agency (EPA) has subsequently required that the list of metals be expanded to include all metals that could be analyzed by XRF equipment. Since this list of metals was rather extensive, causing this screening method to no longer be cost effective, we are proposing to submit all soil samples to the laboratory for Target Analyte List (TAL) metals analysis. Utilizing TAL analysis will provide both EPA and Sherwin-Williams higher quality data that can be definitively used for risk assessment purposes.

We plan to begin the soil sampling at the Vacant Lot in October 2005. If you have any questions or comments, please do not hesitate to contact me at (216) 566-1794 or via e-mail at mlcapichioni@sherwin.com.

Sincerely,

Mary Lou Capichioni
Director Remediation Services

Attachment

cc: H. Martin, ELM
S. Jones, Weston
S. Clough, Weston